## IN THE UNITED STATES BANKRUPTCY COURT FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Warren A. Royea, Sr. : Chapter 13

Gail M. Royea a/k/a Gail M. Moritz

Debtors

Bankruptcy Case: 1:08-02603

AmeriCredit Financial Services, Inc. as as Successor in Interest to Long Beach

Acceptance Corporation

Movant

:

VS.

:

Warren A. Royea, Sr.

Gail M. Royea a/k/a Gail M. Moritz

Respondent :

## ANSWERS TO MOTION FOR RELIEF FROM THE AUTOMATIC STAY

- 1. Admitted.
- 2. Admitted.
- 3. Admitted.
- 4. Admitted.
- 5. Admitted.
- 6. a. Debtors are without sufficient knowledge to form a belief as to the truth of the averments contained in Paragraph 6a and therefore deny same.
  - b. Admitted. By way of further answer, Debtors would like to enter into a (6) six month stipulation with Movant to resolve the arrears. (Debtors have tendered the November payment directly to Movant).
- 7. Admitted.
- 8. Admitted.
- 9. No response required.
- 10. No response required.
- 11. a. Admitted. See response to paragraph 6b.
  - b. No response required.

- Admitted. c.
- d. Denied.
- 12. No response required.
- 13. No response required.
- 14. No response required.
- 15. Admitted.

WHEREFORE, Respondents request that Movant's Motion be denied.

Respectfully submitted, **DeArmond & Associates** 

Date: November 21, 2008 BY: /s/ Keith B. DeArmond

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